

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CASE NO. 04-CV-12137 JLT

SUZANNE GENEREUX and BARRY  
GENEREUX, Individually and as Parents  
and Natural Guardians of their minor  
children, ANGELA GENEREUX and  
KRISTA GENEREUX,  
Plaintiffs,

v.

AMERICAN BERYLLIA, CORP., BRUSH  
WELLMAN, INC., BRUSH WELLMAN  
CERAMICS, INC., BRUSH WELLMAN  
CERAMIC PRODUCTS, INC., HARDRIC  
LABORATORIES, INC., KYOCERA  
AMERICA, INC., KYOCERA INDUSTRIAL  
CERAMICS CORP., and RAYTHEON  
COMPANY,  
Defendants.

FILED UNDER SEAL  
CONTAINS CONFIDENTIAL  
INFORMATION, SUBJECT TO  
PROTECTIVE ORDER

MEMORANDUM OF LAW IN SUPPORT OF MOTION OF DEFENDANT  
AMERICAN BERYLLIA, INC. FOR SUMMARY JUDGMENT

CLARK, HUNT & EMBRY

William F. Ahern, Jr. (BBO #013365)  
Mandi Jo Hanneke (BBO #657349)  
55 Cambridge Parkway  
Cambridge, MA 02142  
(617) 494-1920